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Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Ex Parte Submission

**Re: Accelerating Wireless Broadband Deployment by Removing Barriers
to Infrastructure Investment, WT Docket No. 17-79**

Dear Ms. Dortch:

On Tuesday, November 7, 2017, Robert Vitanza and Colleen Thompson of AT&T Services, Inc. met with Garnet Hanly (via telephone), Suzanne Tetreault, David Sieradzki, Jill Springer, Mary Claire York, and Jeff Steinberg of the Wireless Telecommunications Bureau about the draft order on replacement poles proposed for consideration in this docket.

We acknowledged the Commission's continued efforts to streamline Federal regulatory processes for infrastructure deployment, and in particular for replacement poles. We also applauded the timely nature of the draft order and proposed minor modifications in recognition of industry pole replacement practices and to increase the prospect of providing regulatory relief for more pole replacements without impacting historic properties.

We explained that most pole replacements would not meet the "same hole" or the maximum 10% taller conditions proposed in the draft order for exclusion from National Historic Preservation Act (NHPA) review. Industry practice when replacing a pole is to deploy the replacement pole near the original pole, which is removed when utility lines are transferred to the replacement pole. This practice minimizes potential disruptions to utility facilities and the number of trucks needed to perform the replacement. With respect to pole height, most replacement poles will be 5-10 feet taller than the original pole. Yet, the proposed exclusion would not apply to those increases because, as the draft order recognizes, "poles are typically 25 to 40 feet tall," which would allow the NHPA exclusion to apply only up to a 4 foot taller pole, an unlikely scenario because industry standard poles come in 5 foot increments.

We proposed minor changes to the draft order to address these conditions, namely allowing for replacement poles to be deployed within 10 feet of the original hole and that are up to 10 feet taller than the original pole. These changes still allow for only *de minimis* deviations from the original pole and thus, have no reasonable potential to impact historic properties, while covering the vast majority of replacement poles that will be needed for small cell facility deployments.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in this docket.

Sincerely,

A handwritten signature in blue ink that reads "Colleen Thompson". The script is cursive and fluid.

Colleen Thompson

CC:

Suzanne Tetreault

David Sieradzki

Jill Springer

Mary Claire York

Jeff Steinberg